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**VIA FEDERAL EXPRESS**

November 13, 2000

National Highway Traffic Safety Administration  
Docket Management, Room PL - 401  
400 Seventh St., SW  
Washington, DC 20590

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Subject: Importation of Nonconforming 1999-2000 Porsche GT3 Passenger Cars -  
Docket No. NHTSA-2000-7965 - 2

On behalf of Dr. Ing. h.c.F. Porsche AG, Porsche Cars North America, Inc. submits the following comments in response to the notice published in the Federal Register on October 6, 2000 at 65 FR 59889.

Based on our review of the information presented in the Federal Register, there are many relevant factors which, in our opinion, may prevent NHTSA from making a determination that the subject vehicles are substantially similar to those that were originally manufactured and certified for sale in the U.S.

The 1999 and 2000 Porsche GT3 differ in significant details from the 911 models originally manufactured for the U.S. market for model years 1999 and 2000. There is no U.S. certified counterpart to the non-U.S. certified 1999 and 2000 Porsche GT3. Compared with the 911, the GT3 possesses the following:

- a significantly different fuel tank of 90 liters volume compared to 64 liters for the 911 Carrera, and 63 liters for the 911 Carrera 4;
- a different engine of 3.6 liters displacement instead of 3.4 liters for the 911;
- different cooling and lubrication system; and
- a different suspension system.

The different parts of the GT3 have not been subjected to any compliance testing with Federal Motor Vehicle Safety Standards.

In detail:

**1. Standard No. 102 - Transmission shift lever sequence, starter interlock, and transmission braking effect.**

The GT3 does not comply with Standard No. 102. In the petition the importer has not submitted any changes to achieve compliance with Standard No. 102.

**2. Standard No. 103 - Windshield defrosting and defogging system.**

The engine of the GT3 is very different from that of the 1999-2000 911 models that were manufactured and certified for sale in the United States. The cooling circuits of both engines differ significantly. As a result the heating system of the GT3 is different from that of the U.S. certified 1999-2000 911. The GT3 has not been tested for compliance with Standard No. 103.

**3. Standard No. 105 - Hydraulic and electric brake systems, and Standard No. 135 Passenger car brake system.**

The braking system of the GT3 is significantly different from that of the U.S. certified 1999-2000 911. The braking system of the GT3 has not undergone any testing that would be necessary to establish compliance with Standard Nos. 105 and 135.

**4. Standard No. 106 - Brake hoses.**

The GT3 uses brake hoses that differ from those of the U.S.-certified 1999-2000 911. The brake hoses of the GT3 have not been tested for compliance with Standard No. 106.

**5. Standard No. 201 - Occupant protection in interior impact.**

The GT3 does not comply with Standard No. 201 when equipped with the original rollbar.

**6. Standard No. 202 - Head restraints, and Standard No. 210 - Seat belt assembly anchorages.**

The GT3 can be ordered with an optional bucket seat. This seat has not been tested for compliance with Standard No. 202. In a vehicle equipped with this optional bucket seat one seat belt anchorage is different. This anchorage has not been tested for compliance with Standard No. 210.

**7. Standard No. 208 - Occupant crash protection.**

The airbag system of the GT3 is significantly different from that of the U.S. certified 1999-2000 911. This is due to the different structural elements of the GT3 (bigger fuel tank, different suspension, less weight). The GT3's airbag system has not been tested for compliance with Standard No. 208.

**8. Standard No. 209 - Seat belt assemblies.**

The GT3's seatbelts do not comply with Standard No. 209.

**9. Standard No. 214 - Side impact protection, and Part 581 Bumper Standard.**

The GT3 has a different suspension system than the U.S. certified 1999-2000 911. The vehicle is 40mm lower than the U.S. certified 1999-2000 911. This lower suspension has a significant influence on side impact protection. The GT3 has not undergone any compliance testing for Standard No. 214. The proposed modifications by the petitioner will not bring the GT3 to the height in which the U.S. certified models were tested for compliance with the standards.

**10. Standard No. 301 - Fuel system integrity.**

The fuel tank of the GT3 is significantly different from that of the U.S. certified 1999-2000 911. The GT3's fuel tank has a larger volume and is in a slightly different location from the 1999-2000 911. The GT3's fuel tank extends further towards the front end of the car and may therefore behave differently from that of a U.S. certified 1999-2000 911 in case of a crash or rollover. The GT3's fuel tank has not been tested for compliance with Standard No. 301. In our opinion, the changes submitted in the importer's petition for the fuel system are not sufficient to secure compliance with Standard No. 301.

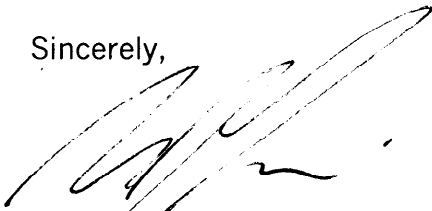
With respect to the changes proposed by the petitioner relative to compliance with Standard Nos. 101 - Controls and Displays, 108 - Lamps, Reflective Devices and Associated Equipment, and 114 - Theft Protection; insufficient information has been provided to allow us to render an opinion as to whether the modifications proposed are sufficient to ensure compliance with these Safety Standards. Porsche recommends NHTSA request the petitioner to specify each modification to be conducted by parts to be replaced or installed, including the Porsche part number (if any).

As evidenced by the above list, there are many factors which, in our opinion, may prevent NHTSA from making a determination that the subject vehicles are substantially similar to those that were originally manufactured and certified for sale in the U.S. Should, however, NHTSA ultimately make a determination that the subject vehicles are substantially similar and capable of being modified to comply with U.S. safety standards, we respectfully request the following:

- all parts changed for compliance purposes be shipped to NHTSA, and
- the petitioner identify the company (ICI) that will modify the cars to comply with U.S. emission requirements.

Should you have any questions concerning these comments, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Lewis', with a stylized flourish at the end.

Walter Lewis  
Sr. Compliance Engineer